

CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B., D.P.,
A.F., C.A., R.K., K.P., and T.H.,

Plaintiffs,

v.

RED ROOF INNS, INC., FMW RRI
NC, LLC, RED ROOF
FRANCHISING, LLC, RRI WEST
MANAGEMENT, LLC, VARAHI
HOTEL, LLC, WESTMONT
HOSPITALITY GROUP, INC., and
RRI III, LLC,

Defendants.

PL Sum. J.

Ex. 074

CIVIL ACTION FILE

NO. 1:20-cv-5263-MHC

JURY TRIAL DEMANDED

Pursuant to Fed. R. Civ. P. 38

**PLAINTIFF E.H.'S OBJECTIONS AND RESPONSES TO
DEFENDANT RED ROOF INNS, INC.'S FIRST INTERROGATORIES**

Plaintiff E.H. ("E.H." or "Plaintiff") hereby provides objections and responses to Defendant Red Roof Inns, Inc.'s First Interrogatories (the "Interrogatories"). Plaintiff reserves the right to amend and supplement these responses as discovery progresses. Plaintiff states that, in these responses, she provides the identity of Victims of Sex Trafficking only subject to the Court's June 4, 2021 Protective Order (Doc. 74). Under this Order, during the pre-trial proceedings in this litigation and in any public filings,

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a modeling agency and began to take photographs of E.H. as part of his purported modeling agency. But Mr. [REDACTED] also had E.H. perform sex acts for payment, and he would keep the money collected. He also forced E.H. to use drugs and used her drug addiction to keep E.H. compliant. Mr. [REDACTED] also had E.H. watch his seven children when she wasn't working.

Mr. [REDACTED] trafficked E.H. at various hotels in the Atlanta area as well as other cities from at least 2014 through July of 2018. He started by posting ads of E.H. on online websites like Listcrawler but after the first year of trafficking, he had E.H. post ads of herself on Backpage, Eros, Megapersonals, and Listcrawler. In these ads, she would sometimes refer to herself as a "friend of Star."

Mr. [REDACTED] trafficked E.H. at the Smyrna Red Roof Inn as early as 2014 and off and on through 2018. E.H. often stayed at this hotel to be trafficked for sex over long weekends and her average stay at this hotel was about one week per visit. She believes she was trafficked out of this hotel at least ten times each year during her trafficking, and likely more often than that. In total, she probably was at this hotel two weeks of every month while she was trafficked.

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While trafficked at this hotel, E.H. would see ten to fifteen buyers per day, collecting up to \$3,000 each day, which she would have to give to Mr.

██████ She was at this hotel so often that buyers who came to this hotel to purchase sex expected to see her there and would often ask other sex trafficking victims if she were there.

Although E.H. does not recall the exact dates of each of her visits, she is confident she was at this hotel on the following dates:

- 09/12/2017
- 05/31/2018
- 08/22/2018
- 08/25/2018
- 08/26/2018
- 09/02/2018
- 09/07/2018
- 08/30/2018

E.H. recalls that police came to this hotel at some point and arrested four women and two men. At that time, Mr. ██████ moved E.H. to a room in the back of the building to avoid being noticed by the police and so they could see better who was coming and going from the hotel.

E.H. also interacted with hotel employees at this hotel and is confident that employees knew about sex trafficking occurring at the hotel. She remembers one worker, a middle-aged Indian man who claimed to be the husband of the owner of the hotel. He would pay E.H. for sex sometimes

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twice per week, paying \$300 per visit. And if there were police activity in the area, this worker would call E.H. and warn her about it so she and her trafficker would not get caught. He would see E.H. consistently for about two years during her trafficking.

E.H. also recalls two security guards who worked at the hotel who knew about her trafficking. One was called Marcus. He was a muscular man with tattoos who worked nights. He paid to have sex with E.H. She does not recall the name of the other security guard, but he also paid to have sex with E.H.

E.H. also interacted with housekeeping staff who would have seen clear signs of her trafficking, including trashcans full of condoms and E.H.'s excessive request for extra towels (sometimes three times per day). One housekeeping worker in particular was aware of the trafficking going on in the hotel. She would ask E.H. for cigarettes. She does not recall this worker's name but she appeared to be drug-addicted and was missing teeth.

E.H. had a client who would pay for sex at this hotel. He introduced himself as a "corporate buyer" of the Red Roof Inn and he said he knew about complaints of sex trafficking at the hotel but he overlooked them because he himself paid for sex. He was a stocky, white man in his early 40s.

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VERIFICATION

The answers set forth in **PLAINTIFF E.H.'S OBJECTIONS AND RESPONSES TO DEFENDANT RED ROOF INNS, INC.'S FIRST INTERROGATORIES** are true and correct to the best of my knowledge, information and belief based on the information currently available to me. I reserve the right to make changes to these Objections and Responses if it appears that an error or omission has been made therein or if more information becomes available.

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I hereby verify, pursuant to 28 U.S.C. § 1746 and subject to penalty of perjury that the factual information contained in the foregoing responses to interrogatories is true and correct to the best of my knowledge, information and belief.

This ____ day of August, 2021.

E.H.

